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February 25, 2011

BY HAND AND BY ECF

Honorable Sandra L. Townes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. James Bombino, et al., 10 Cr. 147 (SLT)

Dear Judge Townes:

With the consent of the government, I respectfully write on behalf of all parties to request that the current motion schedule be revised in the above-referenced matter. Following the last status conference on December 1, 2010, the government has provided substantial additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure that is material to the defendants' identification of motions that need to be filed.

The parties therefore respectfully request the following revised motion schedule:

Defendants' motions due: April 1, 2011
Government's response due: May 6, 2011
Defendants' reply due: May 20, 2011

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We also respectfully ask that the Court schedule a status conference at its earliest convenience to address additional issues arising from the government's most recent massive discovery dump.

Respectfully submitted,
/s/
Sarita Kedia

cc: AUSA Amy Busa
AUSA Michael Tremonte

All defense counsel